

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
WILLIAM GRECIA,

Plaintiff,

**COMPLAINT**

v.

**JURY TRIAL DEMANDED**

JPMORGAN CHASE & CO.,

Defendant.  
-----X

William Grecia brings this patent-infringement action against JPMorgan Chase & CO. (hereinafter, “Chase”).

**Parties**

1. William Grecia is an individual. He maintains a residence in Downingtown, Pennsylvania.

2. Chase is a national banking association, having a principal place of business in New York, New York.

**Jurisdiction and Venue**

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over Chase. Chase conducts continuous and systematic business in New York and in this District. Chase maintains corporate offices and its headquarters in this District. This patent-infringement case arises directly from

Chase's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Chase would be consistent with traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1) and 1400(b).

**Infringement of U.S. Patent No. 8,887,308**

7. William Grecia hereby realleges and incorporates by reference, as if fully set forth herein, the allegations of paragraphs 1-6 above.

8. William Grecia is the exclusive owner of the '308 patent, which is attached hereto as "Exhibit 1."

9. The '308 patent is valid and enforceable.

10. Chase infringes claim 1 of the '308 patent as detailed in the chart attached hereto as "Exhibit 2."

**Prayer for Relief**

WHEREFORE, William Grecia prays for the following relief against Chase:

- (a) Judgment that Chase has directly infringed claim 1 of the '308 patent;
- (b) A reasonable royalty;
- (c) Pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) Post-judgment injunction; and
- (e) Such other and further relief as the Court may deem just and proper.

**Demand for Jury Trial**

William Grecia demands a trial by jury on all matters and issues so triable.

Date: April 26, 2018

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

Matthew M. Wawrzyn (*pro hac vice* pending)

*matt@wawrzynlaw.com*

WAWRZYN & JARVIS LLC

2700 Patriot Blvd., Suite 250

Glenview, IL 60026

847.656.5864

*Counsel for William Grecia*